

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

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This Document Relates to All Actions

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**DECLARATION OF GENEVIEVE M. ZIMMERMAN**

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesh & Spence, Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. I submit this declaration in support of Plaintiffs' Response Opposing Defendants' Motion for Contempt Order and Sanctions. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Affidavit of Genevieve M. Zimmerman.
4. Attached hereto as Exhibit 2 is a true and correct copy of the Affidavit of Kyle W. Farrar.
5. Attached hereto as Exhibit 3 is a true and correct copy of the Affidavit of Gabriel A. Aassad.
6. Attached hereto as Exhibit 4 is a true and correct copy of the Affidavit of Alberto T. Garcia, III.
7. Attached hereto as Exhibit 5 is a true and correct copy of the April 5, 2019 email from Plaintiff's counsel to 3M.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Plaintiffs' Motion to Compel in Petitta v. 3M Co, et al.
9. Attached hereto as Exhibit 7 is a true and correct copy of the Supplemental Brief in Support of Plaintiffs' Motion to Compel in Petitta v. 3M Co, et al.
10. Attached hereto as Exhibit 8 is a true and correct copy of the June 4, 2019 email from 3M's counsel.

Dated: June 13, 2019

/s/ Genevieve M. Zimmerman

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**Plaintiffs Co-Lead Counsel**